

SCHULMANBHATTACHARYA

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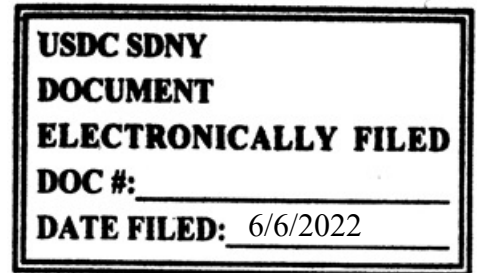
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June 3, 2022

VIA ECF

The Honorable Katharine H. Parker
United States District Court
500 Pearl Street, Room 750
New York, NY 10007



Re: *Optionality Consulting Pte. Ltd v. Edge Technology Group, LLC et al.*
Case No. 1:18-cv-05393
Joint Request to Stay Discovery and for Status Conference

Dear Judge Parker:

Plaintiff Optionality Consulting Pte Ltd. ("Optionality") together with Defendants Edge Technology Group LLC ("Edge"), James Nekos ("Mr. Nekos"), and John Pecoraro ("Mr. Pecoraro") (collectively, the "Parties"), hereby jointly request a brief stay of discovery until such time as the Court rules on the Parties' respective discovery motions (ECF Nos. 82-89), which currently are pending.

As set forth more fully in Plaintiff's Motion to Compel Discovery (ECF No. 86), Plaintiff has moved to compel the production of certain information and documents, which it believes it needs prior to engaging in depositions in this matter. Similarly, as set forth more fully in Defendants' Motion for Protective Order Requiring Identification of Trade Secrets and Confidential Information (ECF No. 82), Defendants have moved to compel the identification of certain information, which they believe they need prior to engaging in depositions in this matter. Accordingly, the Parties have been waiting on the resolution of both motions before going forward with depositions.

Pursuant to the Scheduling Order in this case, the deadline to complete depositions was amended by the Parties from June 3, 2022, to June 17, 2022, with fact and expert discovery scheduled to close on June 17, 2022, and August 18, 2022, respectfully. In light of the foregoing, the Parties respectfully request that the deadline to complete depositions and fact and expert discovery be stayed for the time being to allow the Court time to decide both motions. Once the motions have been decided, the Parties request the Court schedule a status conference in order to reset the discovery deadlines at that time.

Thank you for your attention to this matter.

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Dated: June 3, 2022

Respectfully,

/s/Jeffrey S. Gavenman

Jeffrey S. Gavenman

/s/ Matthew G. Allison

Matthew G. Allison

*Counsel for Plaintiff Optionality
Consulting Pte. Ltd*

*Counsel for Defendants Edge
Technology Group LLC, James
Nekos, and John Pecoraro*

cc: All counsel of record (via ECF)

APPLICATION DENIED. The parties' request for a stay is now moot as the Court has resolved the instant dispute at ECF No. 91. By June 9, 2022 the parties shall file a joint letter proposing an amended discovery schedule in lieu of the requested conference.

SO ORDERED:

Katharine H Parker
HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE

6/6/2022